

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Civil No. 20-cv-13293

vs.

Hon. David M. Lawson

**INTERNATIONAL UNION, UNITED
AUTOMOBILE, AEROSPACE, AND
AGRICULTURAL IMPLEMENT
WORKERS OF AMERICA,**

Defendant.

**GOVERNMENT’S MOTION TO FILE AMENDED RESPONSE TO
MOTION TO INTERVENE**

On March 8, 2021, the government filed a response to a pending motion to intervene. (ECF No. 15, PageID.207). That response brief had hyperlinks, e.g., to newspaper articles (e.g., ECF No. 15, PageID.206) that were inadvertently removed when the government’s brief was “flattened” to a .pdf for filing. The government seeks the Court’s permission to re-file an amended response brief, that is identical to its previous filing, but fixes the hyperlinks.

Pursuant to E.D. Mich. L.R. 7.1, undersigned counsel sought concurrence in the requested relief by sending a copy of this motion and the proposed new response brief by e-mail to counsel for the UAW and counsel for proposed intervenors on March 10, 2021. Counsel for UAW does not object to the

government's request. To date, counsel for UAW and Houldieson has not responded to the government's request. Accordingly, despite undersigned counsel's reasonable efforts to obtain agreement in the relief requested, counsel was unable to obtain agreement.

Respectfully submitted,

Saima S. Mohsin
Acting United States Attorney

/s/ Steven P. Cares
Assistant United States Attorney
United States Attorney's Office
Eastern District of Michigan
211 West Fort Street, Suite 2001
Detroit, MI 48226
Phone: (313) 226-9139
Email: steven.cares@usdoj.gov

/s/ David A. Gardey (with consent)
Assistant United States Attorney
United States Attorney's Office
Eastern District of Michigan
211 West Fort Street, Suite 2001
Detroit, MI 48226
Phone: (313) 226-9591
Email: david.gardey@usdoj.gov

Dated: March 12, 2021

Certificate of Service

I hereby certify that on March 12, 2021, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the attorneys of record.

/s/ Steven P. Cares
Assistant United States Attorney
United States Attorney's Office
Eastern District of Michigan
211 West Fort Street, Suite 2001
Detroit, MI 48226
Phone: (313) 226-9139
Email: steven.cares@usdoj.gov